

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

JAMES M. DUNLAP,

Plaintiff,

Civil No. 2:11-cv-00272-RBS -DEM

v.

**COTTMAN TRANSMISSION
SYSTEMS, LLC and TODD P.
LEFF,**

Defendants.

JOINT MOTION TO EXTEND EXPERT DISCLOSURE DATES

The parties to this action, by their undersigned counsel, jointly move the Court to enter the accompanying Agreed Order to extend the dates for expert disclosure contained in the Scheduling Order, dated January 8, 2016. The parties seek this extension not for the purpose of delay, but rather in an attempt to make discovery more streamlined and efficient. The parties wish to make the dates for expert disclosure, and more particularly the deadlines for completing expert disclosure, coextensive with the deadlines for fact discovery, in order to make both expert discovery and fact discovery more efficient. The parties do not propose to extend the completion of expert discovery beyond the dates set forth in the Scheduling Order. The dates the parties wish to change, and the proposed new dates, are as follows:

<u>Event</u>	<u>Current Date</u>	<u>Proposed Date</u>
Plaintiff's Expert Disclosures	April 7, 2016	May 6, 2016
Defendants' Expert Disclosures	May 9, 2016	June 6, 2016
Rebuttal Disclosures	May 23, 2016	June 18, 2016
Completion of Expert Discovery	June 20, 2016	June 20, 2016

The parties respectfully request entry of an Order reflecting this revised schedule. An Agreed Order accompanies this Motion.

Respectfully submitted,

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April 5, 2016

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of April, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send notice to all counsel of record.

/s/ Donald N. Hornstein

Donald N. Hornstein

Virginia Bar No. 19749